

Subject: Discovery Follow-Up and Update Requests
Date: Wednesday, April 28, 2021 at 7:20:56 PM Eastern Daylight Time
From: Edward Krugman
To: Quinn,Robert E
CC: Darius Charney, Claudia Wilner, jjoachim@cov.com, Keisha Williams, Chinyere Ezie
Attachments: COB051503.pdf, image001[36].png

Rob

I write to request updates and/or follow up on a number of discovery items that have come to our attention as we have been reviewing your production. This e-mail is separate and apart from the thread that has been developing between us over the last month or so and that will be the subject of our meet-and-confer on Friday.

- Please update the document production regarding the City budget and the BTVA (RFPs 51 and 66).
 - Budget production has been made through the 2018-2019 Recommended and Adopted Budgets. There should be two more years available by now; please produce them. The production should include the Recommended and Adopted Budgets for each year, at the same level of detail as the production for 2018-2019.
 - The BTVA production includes only the 2016 and 2017 Annual Reports. Please produce the 2018 and 2019 reports, and the 2020 report when it becomes available. In addition, we note that you have not otherwise produced documents in response to Request 66. After we have received and reviewed the Helfer ESI, we will determine if additional follow-up is needed.
- Document COB046734 is a "Housing/Strike Force Weekly Overtime Report." So far as we can tell, it is the only such document you have produced. Please produce all such weekly reports from January 1, 2012 through the present (we assume the Strike Force reports will only go through the dissolution of the Strike Force in 2018).
- Recording here the request, from my e-mail of 4/26, regarding "Traffic Stop Reports."
- In reviewing the documents you have produced recently, we have become concerned that there may be data sources at BPD that should have been, but were not, tapped with respect to your original document production.
 - Please see Documents COB051503-04 attached (the full document includes two additional pages, but 51503-04 are what we're focusing on). These are a "Dispatch Monitor – Unit History Report" (51503) for Unit H440 (Whiteford and Miller) for December 13, 2017 and a Complaint Summary Report for one of the traffic stops listed on the Unit History Report (51504).
 - We can see the four listed complaints (17-3450582, 0599, 0776, 0833) in CHARMS, but the CHARMS data we received from Erie County has nothing like the detailed, second-by-second information listed in either of the two attached documents.

- Moreover, although “Summons” is apparently a “disposition” (see COB051504), the “disposition code” in CHARMS does not distinguish between traffic stops where a summons was issued and those where no summons was issued. All traffic stops in CHARMS are coded 3005.
- All this strongly indicates that there is *another* data system at the BPD, probably tied to Dispatch, that feeds CHARMS and that records more information than ultimately makes it to CHARMS. Please locate that database and provide us as soon as possible a field list, a codebook, and a listing (by date and, if appropriate, by type of information) of what is retained in the live system, what is archived, and what is not available at all. We will then get back to you with what should be produced.

Best

EPK



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